



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 4
ATLANTA FEDERAL CENTER
61 FORSYTH STREET
ATLANTA, GEORGIA 30303-8960

September 4, 2013

CERTIFIED MAIL
RETURN RECEIPT REQUESTED

Mr. Fred Otto
Robins Restoration Manager
78 CEG/CEANR
775 Macon Street, Building 1555
Robins Air Force Base, Georgia 31098-2201

Dear Mr. Otto:

The U.S. Environmental Protection Agency (EPA) has received and reviewed the following document:

- **Site No. 04K1; 2012 Annual Operations, Maintenance, and Inspection Report for LF004 – Landfill No. 4 (SWMU 4) (Annual Report), Robins Air Force Base (AFB), Georgia, May 2013.**

The EPA's comments on the Annual Report are enclosed with this letter. EPA conducted a technical review of the document for technical adequacy, completeness, and consistency. One general comment and four specific comments are included in the enclosed reviews which highlight several issues identified during EPA's evaluation.

The EPA looks forward to working with Robins AFB to resolve these comments. If you have any questions, please contact me at (404) 562-8533.

Sincerely,

A handwritten signature in black ink, appearing to read "Martha Berry", is written over a horizontal line.

Martha Berry, Senior RPM
NC/SC/GA Federal Oversight Section
Federal Facilities Branch
Superfund Division

Enclosure

cc: Amy Potter, Georgia Environmental Protection Division

**EPA Comments on
Robins Air Force Base, Georgia; Site No. 04K1; 2012 Annual Operations, Maintenance, and
Inspection Report for LF004 – Landfill No. 4 (SWMU 4), dated May 2013**

GENERAL COMMENT

1. The 2012 Annual Operations, Maintenance, and Inspection Report for LF004 – Landfill No. 4 (SWMU 4), dated May 2013 (Annual Report) includes field inspection photographs in Appendices B, C, and D taken during the 2012 third, second and first quarters, respectively. The photographs presented in each of the appendices capture differing issues related to the quarter associated with the specific appendix. It would be advantageous to include photographs of key features such as the landfill cover drains every quarter to note any issues or to document that corrective actions have been made. For example, the photographs of the landfill cover drains in Appendix D for the first quarter of 2012 show that they are clear of debris, while the photographs in Appendix B for the third quarter of 2012 show the drains covered with grass clippings. However, there are no photographs of the drains presented for the fourth quarter of 2012 to document that the drains are clear of debris and surface water flow is not impacted. Additionally, photographs presented in Appendix C for the second quarter of 2012 show bare areas on the vegetative cover. However, there are no photographs presented for the subsequent third and fourth quarters to document that the bare areas remain on the cover, or have been repaired. Please revise the Annual Report to include photographic documentation of issues and related corrective actions that were taken to address the concerns captured in the photographs. Additionally, provide photographs for the fourth quarter field inspection in Appendix A.

SPECIFIC COMMENTS

1. Executive Summary, Page ES-1

The text states that the quarterly inspections were performed on April 27th, June 28th, September 19th, and November 8th. The inspection conducted on April 27th appears to fall outside of the first quarter of the monitoring period. Please revise the Annual Report to explain this discrepancy and adjust any correlations to previous first quarter results.

2. Section 4.1, Mowing, Page 4-1

The text states, “The O&M Plan (Earth Tech, Inc. 2005) for LF004 requires that vegetation be maintained at an approximate height of 6 to 8 inches.” However, numerous parts of the report including Section 3.0, Landfill Inspections, and Appendices B, C, and D indicate that the cover vegetation was up to 18 inches in height at some points in time. As such, removing/cutting more than 50% of the vegetative growth/height on the cover can lead to stressed vegetation. Additionally, the chance for the clippings to clog the drains of the landfill cover increases and creates an unwanted mulch layer that inhibits growth on the vegetative cover. Please revise the Annual Report to explain the cover maintenance plan in greater detail. Specifically, discuss how the mowing frequency is decided or determined to ensure compliance with the approved O&M Plan.

3. **Section 7.0, Conclusions and Recommendations, Page 7-1**

The second paragraph states the contaminant plume has reduced in size and has not migrated since the groundwater recovery system was shut down in 2007. Historical trichloroethylene (TCE) plume maps for the years 2007 through 2010 are presented in Figure 16, Landfill No. 4 Historical TCE Concentrations. Although the provided plume maps depict the TCE groundwater contamination in map or plan view, the Annual Report does not present the TCE contaminant plume in cross section. Additionally, the plumes presented from years 2007 through 2010 appear to be roughly the same size. To better illustrate that the TCE plume has reduced in size, plume maps through time should be prepared to depict both map view and cross-sectional view. A comprehensive assessment and evaluation of the long term monitored natural attenuation (MNA) processes and trends is underway to ensure long-term protectiveness of the selected remedy at LF004, the results of which will be presented in the next (2013) annual report. As such, it is recommended the 2013 Annual Report include cross sectional view(s) of the relevant plume(s) to support the assertion that the size of the contaminant plume has been reduced via MNA.

4. **Appendix A, LF004 Inspection Report, Fourth Quarter 2012, Table A.1.6**

The table contains columns with the headings “Recommendations/Status Update/Outstanding Issues” and “Date Corrected.” The recommendations column indicates the need for backfilling depressions while the date corrected column indicates that it was corrected in 2011. This same table with the same column headings is included in Appendices A, B, C, and D. However, as documented in the table, it is unclear how the issues noted during 2012 could be corrected in 2011. Please revise the table to address this issue.